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# **EXHIBIT A**

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS **EASTERN DIVISION**

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JOHN J. VAUGHN, GERALD A. KALBFLEISCH, and MICHAEL AND MYRTLE HATHAWAY,	) ) )
Plaintiffs,	) )
v.	
	) Civil Action No. 1:04-CV-10988 (GAO)
PUTNAM INVESTMENT	) )
MANAGEMENT, LLC and	
PUTNAM RETAIL MANAGEMENT	)
LIMITED PARTNERSHIP,	)
Defendants.	) ) )

### NOTICE OF TAKING DEPOSITION OF CHARLES HALDEMAN

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 26 and 30, Vaughn, Kalbleisch, and Hathaway ("Plaintiffs") by and through their attorneys, Robins, Kaplan, Miller & Ciresi L.L.P. and Ackerman, Link, Sartory, will take the deposition upon oral examination of the defendants, by and through Charles Haldeman. The deposition will be held at the office of Robins, Kaplan, Miller & Ciresi, 800 Boylston Street, 25th Floor, Boston, MA on February 28, 2007, and will commence at 9:00 a.m. before a Notary Public or any other person authorized to administer oaths. The deposition shall continue from day to day, Saturdays, Sundays, and legal holidays excepted, until completed. The deposition will be recorded by stenographic means and/or videotape.

Respectfully submitted,

VAUGHN, KALBLEISCH, and HATHAWAY

By their attorneys,

David E. Marder (BBO #\$52485)

Marc N. Henschke (BBO #636146)

Lisa A. Furnald (BBO #631059)

Jonathan D. Mutch (BBO #634543)

Meghan E. Walt (BBO #658971)

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

800 Boylston Street, 25th Floor

Boston, MA 02199

Tel. (617) 267-2300

Of Counsel:

Thomas R. Grady (admitted pro hac vice) Scott J. Link (admitted pro hac vice) Ackerman, Link, & Saratory, P.A. 720 Fifth Avenue, Suite 200 Naples, FL 34102

Dated: February 15, 2007

#### **CERTIFICATE OF SERVICE**

I, Scott Link, certify that I served a copy of the foregoing Notice of Deposition, via first-class mail and e-mail, on February 15, 2007 upon Defendants' counsel. David S. Clancy of Skadden, Arps, Slate, Meagher & Flom LLP, One Beacon St., Boston, MA 02108.

Scott Link

#### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS EASTERN DIVISION

JOHN J. VAUGHN, GERALD A. KALBFLEISCH, and MICHAEL AND MYRTLE HATHAWAY,	
Plaintiffs,	)
v.	) Civil Action No. 1:04-CV-10988 (GAO)
PUTNAM INVESTMENT MANAGEMENT, LLC and PUTNAM RETAIL MANAGEMENT LIMITED PARTNERSHIP,	
Defendants.	) ) )

## REVISED NOTICE OF TAKING DEPOSITION OF CHARLES HALDEMAN

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 26 and 30, Vaughn, Kalbleisch, and Hathaway ("Plaintiffs") by and through their attorneys, Robins, Kaplan, Miller & Ciresi L.L.P. and Ackerman, Link, Sartory, will take the deposition upon oral examination of the defendants, by and through Charles Haldeman. The deposition will be held at the office of Robins, Kaplan, Miller & Ciresi, 800 Boylston Street, 25th Floor, Boston, MA on April 10, 2007, and will commence at 9:00 a.m. before a Notary Public or any other person authorized to administer oaths. The deposition shall continue from day to day, Saturdays, Sundays, and legal holidays excepted, until completed. The deposition will be recorded by stenographic means and/or videotape.

Respectfully submitted,

VAUGHN, KALBLEISCH, and HATHAWAY

By their attorneys,

David/E. Marder (BBO #552485)
Marc N. Henschke (BBO #636146)
Lisa A. Furnald (BBO #631059)
Jonathan D. Mutch (BBO #634543)
Meghan E. Walt (BBO #658971)
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#### Of Counsel:

Thomas R. Grady (admitted pro hac vice)
Scott J. Link (admitted pro hac vice)
Ackerman, Link, & Saratory, P.A.
222 Lakeview Avenue
Suite 1250 - Esperante
West Palm Beach, FL 33401
Tel. (561) 838-4100

Dated: March 15, 2007

#### **CERTIFICATE OF SERVICE**

I, David Marder, certify that I served a copy of the foregoing Notice of Deposition, via first-class mail and e-mail, on March 15, 2007 upon Defendants' counsel, David S. Clancy of Skadden, Arps, Slate, Meagher & Flom LLP, One Beacon \$4, Boston, MA 02108.

David E. Marder